

**Consultation Response from: Ipswich Borough Council
Provided By: Dr Matthew Ling, Head of Public Protection
Date received: 15 February 2013**

At the Executive Committee held on 5th February 2013 I was asked to submit a formal response to your draft PCC plan, which is provided below.

We welcome the opportunity to comment on the draft PCC plan. This recognises the Council's work in many areas that impact on community protection and acknowledges our successful track record of working in partnership with the police and other agencies.

The draft plan is broad in its nature; it details high end overarching priority areas for the county which will include a significant amount of on-going priority community safety led work

Our response is split into 3 parts. The first looking at high-level areas of concern, the second providing more detailed feedback on the objectives and priority areas, and finally those areas that we would like further clarification on.

There are four high-level areas of concern regarding the draft plan:

Financial

A significant point of concern is that the draft budget of 13/14 prepared by the Police Authority included a precept increase. However, we note the Commissioner is not intending to increase the precept in 2013/14. The PCC is therefore considering an immediate cut that the police have not budgeted for until now. Page 4 of the draft plan states 'A further £10.6m must be saved by the end of 2016/17' of which £4.7m has not yet been identified. His plan clearly indicates that this decision will make the financial situation more challenging for the Constabulary and yet he appears confident that the savings can be made and the long-term impact of his precept freeze decision managed without impacting on resources and service levels. It is not clear from the plan how this will be achieved.

We are concerned that this level of saving will have a direct impact on policing resource and that this will fall disproportionately on the non-police part of the budget. At Overview and Scrutiny the PCC indicated that a current under-spend would help bridge this gap. It would be helpful to understand what this under-spend is and how this - and other savings - is going to enable on-going service delivery to be maintained next year, and future years, to the standards envisaged prior to the PCC's appointment.

Needs based led resourcing

We are pleased to see a recognition that Suffolk is a diverse county, with varying needs across its area. However, we are concerned that there is no evidence presented in the draft plan as to how resources will be utilised to recognise the specific needs and issues. We are, especially, concerned as to how this will impact upon the needs of Ipswich, its residents, visitors and workers.

Partnership funding (including crime and disorder reduction grants)

We welcome the recognition in Objectives 3 and 4, and Section 5 of the importance of partnership working. We believe that this is an essential way to target areas and issues; with positive outcomes for individuals and communities.

However we are concerned about the on-going funding of a number of posts (e.g. PCSOs and ASB police team) and projects (e.g. Town Pastors). Some of this funding has traditionally been via the CSP, but should now be funded directly.

We would expect that this aspect is addressed with some urgency because of the importance of continuity in relation to the CSP funded schemes and to ensure an uninterrupted level of service is provided, and avoid uncertainty about their provision. Secondly we would welcome the ability to bid for funding from the PCC. However, currently there is no specific detail on the commissioning process or criteria. We would request that this is clarified soon, so that we can continue a range of intervention projects in Ipswich. (See also our comments in point 2. above.) provision from April 2013

Performance measurement

In general we are disappointed with the quality and precision of the performance measures / indicators – both in terms of levels and timescales. The performance plan links performance measures to partnership working which is positive. However we would be like to see clearer SMART objectives provided.

Detailed Comments on the draft plan:

Making Suffolk Safer - Vulnerable people

Suffolk is identified with a BME population of 7.2%. However, Ipswich has a 10% BME, which is above the county average. It should be noted that these figures probably underestimate the figures due to language issues with the census and increased migration since the census.

There are specific issues with some groups of the immigrant community, that require more extensive attention due to cultural and language issues.

It is important that the plan is flexible in responding to the changes in population. For example at the start of 2014 there will be a relaxation on benefits for people from Bulgaria and Romania. This does need to be taken into account when looking at several key areas of work such as Crime Prevention, Reducing ASB, Supporting Families and providing high quality of service to victims.

As well as the BME community across Suffolk we also need to recognise the needs for people with low literacy and learning disabilities, which at the present time is a big gap. How are the police meeting these needs through their information and services? Recognising the diverse cultural and economic differences for parents in Ipswich is key to them feeling that we are mindful of parents in the Ipswich Borough and wider county area.

Consulting young people via Youth Parliaments, Schools Council, using apprenticeships and Police Cadets is good, however we have a number of Pupil Referral Units in Suffolk where disaffected young people go for education which is not mainstream, we also have groups that gather on our estates and several young people in projects run by Social Care and the youth offending service tackling their vulnerability and risk of sexual exploitation, crime and ASB. Will consideration be given to ensuring that consultation take place with these young people and with their parents / families?

Making Suffolk Safer - Domestic Violence and Abuse

We welcome the inclusion of a section on Domestic Violence and Abuse as we have recognise the relevance to our on-going work in parenting and ASB. However, there is more that needs to be done.

Making Suffolk Safer - Mental Health

Mental health is highlighted within the report, which is a positive as this area impacts greatly on community safety focussed work, most notably with respect of ASB. This section could be enhanced to include the impact of mental health need and the impact on ASB.

Making Suffolk Safer - Substance Misuse (Page 5- Table- Objective 3 and 4)

The emphasis on Prevention needs to be more diverse as Drugs and Alcohol are quoted as impacting on crime levels but there is no reference to economic deprivation, peer pressure or habitual problems i.e. "Breaking the Cycle".

There is recognition in the Coalition Drug Strategy that new psychoactive substances appear quickly (57 per annum), requiring an immediate response.

Will there be funding available to develop proactive projects thus allowing an initiative to be put in place before a new substance becomes overly problematic?

Making Suffolk Safer – Supporting Families

There is much talk about engaging with youth in the plan. However, there is no mention of parents or parenting support, services or work. Every engagement with a young person by the police is an opportunity to engage parents in services available. Many of the people involved in ASB (especially males) are parents and we should be concerned with this aspect of their lives and identifying where we can support them in their parenting role. Recognising that for young pregnant teenagers 85% of girls are still romantically involved with the partner at the birth of the baby however, by the time the baby is one the mother is single.

The Suffolk Family Focus initiative is key to this area and we will do all we can make it work as it does impact on many areas of the plan's objectives. Ipswich has been part of the Respect Agenda for over three years, which has formed a significant area of work with Ipswich being on the forefront of national activity during this time. Parenting and family work is key to this area and we would like to see recognition of the vital role of parenting included in the commissioner's plan.

There should be specific references to parenting. It is widely acknowledged that parenting support which is one of the most important early interventions in preventing ASB and crime and is a national government priority for early intervention.

We refer many parents from parenting programmes into domestic abuse services and many come from the Freedom and other programmes into parenting. There also needs to be stronger links to alcohol and domestic abuse.

Making Suffolk Safer - Anti-Social behaviour – (ASB)

E-cins is an ICT database and case management system which has been adopted across Suffolk by Police, Local authorities and partner agencies. E-cins manages ASB cases with a partnership focus. Consideration could be given to referencing this within the plan, and at supporting the system and its continued development. The system is being monitored so that successful outcomes can be demonstrated when evaluating effectiveness.

When ASB offending is investigated it often leads to unearthing a complex area of need within a home, which cut across many aspects of the PCC draft plan, including domestic abuse and substance misuse. Consideration should be given that a great deal of on-going partnership work addresses such complex need in a holistic way with both the statutory and the third sector working together.

Funding and performance assessment framework

We would like the performance assessment framework to be more robust, with clearer, measureable and quantitative targets. In addition we would like to see the following changes made to the performance assessment framework;

Additions to objectives 3 and 4

Support Families:

- Ensure the development of on-going early intervention parenting strategies are focussed on changing the culture of parenting in the county.
- Embedding a parenting focus across all services.
- Prevent the damaging effects of drugs and alcohol on lives, crime levels and the night-time economy by:
 - Recognising emerging trends and implementing a pro-active response
 - Interventions to reduce inter-generational drug/alcohol use
 - Raising awareness of the harms associated with new psychoactive substances
 - Support Effective crime prevention activity:
- In partnership with other agencies:
 - Deliver community safety advice to young people – Through initiatives such as Crucial Crew and on-going targeted projects within localities and CSP areas.
 - Reduce fear of crime in the Borough – using public consultation such as Ipswich CSP's Community Safety questionnaire to capture local people's views, experiences and perceptions that will help inform and guide the Community Safety Partnership and the partners in pro-active interventions.

Further comments for consideration:

- The use of CCTV is a vital scheme across the county and notably in the Ipswich area. CCTV meets many of the objectives within the plan and cuts across all aspects of service area activity in Community Safety. It is recognised that the CCTV service improves public safety in the town and deterring criminal activity. It is regularly used by the Police for the purposes of solving crime. However the CCTV service is funded solely by the Council at present. We would welcome a discussion to ensure the funding from the Police is proportionate to the usage and support that this provides. Is further work proposed for innovative thinking around the Police OPT theory and more joined up multi-agency service provision?
- Operational Partner Teams (OPTs) are a direct implementation of collaborative working with partners. We support the use of OPTs and these should be further developed in our shared approach to targeting highlighted areas in the plan and this response.
- The draft plan refers to local partners- will there be a shared database for partner search?
- How will the grant/funding process avoid duplication of bids? Will there be support for statutory bidders? (Perhaps, in the same way that third sector applicants will be supported.)
- What will happen to projects where commissioning responsibilities remain after April 2013?
- Night time economy - Page 11- Best Bar None (BBN) which recognises safe licensed premises- the use of word "safe" is potentially misleading, as BBN accredit well managed premises.
- Is there anything that can be done to address the funding cuts in the mental health area of work?
- Through current CSP funding a full time ASB administrator is employed to support the current joint ASB officers based within IBC. Clearly to cut

bureaucracy this post should be funded directly through PCC funding? However are these roles being resourced after April 2013?

- There are at least two PCSOs funded through joint arrangements or through the CSP, in the Norwich Rd area linked to the IBC Community Development/engagement team for the Norwich Rd area, and with Licensing. What is planned for these roles after April 2013? (For one of these joint funding ceased in December 2012.)